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March 7, 2019

VIA ECF

Honorable Cheryl L. Pollak
United States Magistrate Judge
United States District Court, Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

**Re: *Freeman, et al. v. HSBC Holdings plc, et al.*, 14-cv-6601 (DLI) (CLP)
("Freeman I")**

***Freeman, et al. v. HSBC Holdings plc, et al.*, 18-cv-7359 (DLI) (CLP)
("Freeman II")**

Dear Judge Pollak:

Plaintiffs write to respectfully renew their motion to lift the stay of discovery in *Freeman I*, see Pls. Aug. 7, 2018 Mot. to Vac. Stay, ECF No. 167 ("Motion to Lift Stay"), and to seek permission to initiate similarly narrowly-tailored, phased Rule 26 discovery in *Freeman II*. During the November 7, 2018 conference with the Court, Your Honor indicated that you would take the issue of the stay "under advisement" and noted that you were "going to see if the judge comes up with her decision in the next couple of weeks" See Nov. 7, 2018 Transcript, ECF No. 211, at 17:22-18:7 (annexed hereto as Exhibit A).

Plaintiffs are prepared to exchange initial Rule 26(a) disclosures and respectfully request to propound limited discovery requests to all Defendants similar to the exemplar request that Plaintiffs proposed as Exhibit 1 to their Motion to Lift Stay. See proposed initial discovery requests attached hereto as Exhibit B.

Respectfully submitted,


Michael J. Radine

cc: All Counsel via ECF